

***IN THE DISTRICT COURT OF THE UNITED STATES
For the Western District of New York***

**April 2025 Grand Jury
(Impaneled April 7, 2025)**

THE UNITED STATES OF AMERICA

INDICTMENT

-VS-

**TIMOTHY T. JACKSON, JR. a/k/a T
a/k/a T-Rock
(Counts 1-3)**

**GARY FULLER a/k/a G
(Counts 1 and 2)**

Violations:

21 U.S.C. § 846,
18 U.S.C. §§ 924(c)(1)(A)(i),
922(g)(1), and 2

(3 Counts and 3 Forfeiture
Allegations)

COUNT 1

(Narcotics Conspiracy)

The Grand Jury Charges That:

Between in or about October 2022, and on or about January 17, 2024, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendants, **TIMOTHY T. JACKSON, JR. a/k/a T a/k/a T-Rock** and **GARY FULLER a/k/a G**, did knowingly and intentionally combine, conspire and agree together and with others, known and unknown to the Grand Jury, to commit the following offenses, that is, to possess with intent to distribute, and to distribute, 5 kilograms or more of a mixture and substance containing cocaine, a Schedule II controlled substance; 280 grams or more of a mixture and substance containing cocaine base, a Schedule II controlled substance; and 400 grams or more of a mixture and substance containing N-phenyl-N-[1-(2-phenyl-ethyl)-4-

piperidiny] propanamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

The Grand Jury Further Charges That:

Between in or about October 2022, and on or about January 17, 2024, in the Western District of New York, the defendants, **TIMOTHY T. JACKSON, JR. a/k/a T a/k/a T-Rock** and **GARY FULLER a/k/a G**, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 846, as set forth in Count 1 of this Indictment, the allegations of which are incorporated herein by reference, did knowingly possess firearms.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 3

(Felon in Possession of a Firearm and Ammunition)

The Grand Jury Further Charges That:

On or about January 17, 2024, in the Western District of New York, the defendant, **TIMOTHY T. JACKSON, JR. a/k/a T a/k/a T-Rock**, knowing that he had been convicted on or about April 25, 2000, and on or about January 27, 2005, in County Court, Monroe County, New York, of crimes punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, namely, one (1) 9mm Luger (9x19mm) caliber, Smith & Wesson M&P 9 Shield semiautomatic pistol, bearing serial

number HTZ8197, and ammunition, namely, eight (8) unfired 9mm Luger (9x19mm) caliber cartridges (Colt).

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FIRST FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of Counts 1, 2 and/or 3 of this Indictment, the defendant, **TIMOTHY T. JACKSON, JR. a/k/a T a/k/a T-Rock**, shall forfeit to the United States, all of his right, title, and interest in any firearm and ammunition involved or used in the commission of the offense, or found in the possession or under the immediate control of the defendant at the time of arrest, including, but not limited to the following, seized from 45 Willmont Street, Rochester, New York, on or about January 17, 2024:

FIREARM AND AMMUNITION:

- a. One (1) 9mm Luger (9x19mm) caliber, Smith & Wesson M&P 9 Shield semiautomatic pistol, bearing serial number HTZ8197; and
- b. Six (6) 9mm Luger (9x19mm) caliber cartridges (Colt).

All pursuant to Title 18, United States Code, Sections 924(d) and 3665, and Title 28, United States Code, Section 2461(c).

SECOND FORFEITURE ALLEGATION

The Grand Jury Further Alleges That:

Upon conviction of Counts 1 and/or 2 of this Indictment, the defendant, **GARY FULLER a/k/a G**, shall forfeit to the United States, all of his right, title, and interest in any

firearms and ammunition involved or used in the commission of the offense, or found in the possession or under the immediate control of the defendant at the time of arrest, including, but not limited to the following, seized from 86 Forester Street, Rochester, New York, on or about January 17, 2024:

FIREARMS AND AMMUNITION:

- a. One (1) Smith & Wesson M&P pistol frame, bearing serial number DYA1790;
- b. One (1) Taurus pistol frame, bearing serial number TGS87587;
- c. One 12 gauge, Radikal P3 slide action shotgun, bearing serial number 21-P02135;
- d. One (1) Privately Made Firearm (PMF), 5.56x45mm caliber semiautomatic rifle bearing no serial number;
- e. Twenty-four (24) rounds of .223 Remington caliber ammunition; and
- f. Three (3) rounds of 12-gauge ammunition.

All pursuant to Title 18, United States Code, Sections 924(d) and 3665, and Title 28, United States Code, Section 2461(c).

THIRD FORFEITURE ALLEGATION

The Grand Jury Further Alleges That:

Upon conviction of Count 1 of this Indictment, the defendants, **TIMOTHY T. JACKSON, JR. a/k/a T a/k/a T-Rock** and **GARY FULLER a/k/a G**, shall forfeit to the United States, all their right, title, and interest in any property constituting, or derived from,

proceeds obtained, directly or indirectly, as a result of said violation, including, but not limited to:

CURRENCY:

- a. \$21,071.00 United States Currency seized from 45 Willmont Street, Rochester, New York, on or about January 17, 2024.

JEWELRY:

- b. One Rolex Datejust watch, 36mm, Red Roman Dial, seized from 86 Forester Street, Rochester, New York, on or about January 17, 2024.

All pursuant to Title 21, United States Code, Section 853(a)(1) and 853(a)(2).

DATED: Rochester, New York, May 22, 2025.

MICHAEL DIGIACOMO
United States Attorney

By: /s/ Robert A. Marangola
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A TRUE BILL:

/s/ Foreperson
FOREPERSON